

U/M

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

THERESA MONTURANO,
Derivatively on Behalf of Nominal
Defendant GROUPON, INC.,

Plaintiff,

V.

ERIC P. LEFKOFSKY, PETER J. BARRIS,
KEVIN J. EFRUSY, MELODY HOBSON,
BRADLEY A. KEYWELL, THEODORE J.
LEONSIS, ANDREW D. MASON,
and HOWARD SCHULTZ

Defendants,

and

GROUPON, INC.,

Nominal Defendant.

No. 12 C 2507

Judge Joan H. Lefkow

STIPULATION AND ~~PROPOSED~~ ORDER REGARDING SCHEDULING

The parties, subject to this Court's approval, stipulate that Defendants need not answer or file any motion directed to the pending complaint, and further agree that:

1) Plaintiff shall file a Consolidated Complaint that shall be the operative complaint 45 days after entry of the Court's order appointing lead plaintiff and lead counsel.

2) Defendants' Answer(s) or motion(s) to dismiss and accompanying memorandum of law shall be filed within 45 days of the filing of the Consolidated Complaint.

AGREED:

Plaintiff

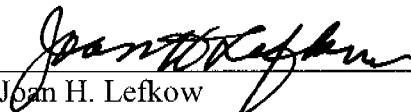
Individual Defendants

By: s/ Marvin A. Miller
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By: s/ Howard S. Suskin
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Dated: April 27, 2012

IT IS SO ORDERED.


Joan H. Lefkow
United States District Judge
APR 30 2012